The following is written testimony provided by James L. Spagnuolo, Jr. I am an attorney who represented and currently represents Sadie Lawson, a legally incapacitated person. I have been advised by Ms. Lawson's guardian, Rebie Britton, that she would like me to present this written and oral testimony at the legislative hearings taking place on July 15 and 16 before the House Insurance Committee.

This testimony is, to the best of my recollection, based on any and all facts contained within my file pertaining to Sadie Lawson's automobile accident of January 10, 2005 and are supported by medical documentation as well as the claims file that has been maintained by Titan Insurance Company.

On January 10, 2005, Sadie Lawson was a pedestrian who was involved in a hit and run accident. She suffered severe and debilitating injuries including, but not limited to a closed head injury which necessitated a craniotomy to relieve pressure on her brain, altered mental status with infrequent periods of altertness, seizure disorders, respiratory failure with tracheotomy placement, an inability to swallow which required the placing of a PEG tube for nutrition and hydration, upper and lower extremity contractions, all of which rendered her in a vegetative state.

She was in Sinai-Grace Hospital from the date of the accident until February 14, 2005, on which date she was admitted to the Lakeland Nursing Home and Rehabilitation Facility. On this date began a horrific journey for Sadie and her sister, Rebie Britton. It began with Rebie's attempts to get Sadie the care and treatment she needed paid for by Titan Insurance Company, who is the insurance carrier assigned by the Assigned Claims Facility. As evidenced by Exhibit A, Sadie was in three nursing homes/rehabilitation facilities prior to finally being placed in a barrier-free apartment with one-on-one care on November 6, 2007. The four nursing facilities were Lakeland, Georgian East/Hartland, Heartland/Dorvin and Regency

Heights Nursing Home. While being a resident of these facilities, she was hospitalized twelve (12) separate times for things ranging from ulcers, infection, high fever, and other issues which clearly evidenced the inability of these facilities to take care of Sadie Lawson's complex medical needs.

From as early as 2005, her guardian, Rebie Britton, inquired of the Titan adjusters as to whether or not Sadie could receive one-on-one care. She was consistently told that the proper place for Sadie was in a facility. It was only in May of 2007 when the case manager, who had been hired by Titan Insurance Company, was fired by the family who then hired an independent case manager, that the family was finally made aware that in fact, they did have the option of one-on-one care in a barrier-free environment. In fact, in June of 2007 Sadie's primary treating physician, a Dr. Asit K. Ray, recommended that a barrier-free apartment and one-on-one care be given. Titan ignored the recommendation of one of Sadie's primary treaters, and continued to take the position that an apartment was not cost-effective and insisted that Sadie be placed and kept in a facility.¹

Not only did the Titan adjuster choose not to heed the medical recommendations of Dr. Ray and Sadie's other treaters, but she went so far as to contact the facility, Hartland of Dorvin, where Sadie was a resident, and convinced them to agree that it was not a good idea for Sadie to be placed in an apartment. That note in the Claims log is attached as Exhibit B at page 61 and also includes an entry that an apartment was not cost effective.

The next step taken by Titan Insurance Company was re-hire the case manager fired by the family, who were clearly at the beck and call of Titan Insurance Company. On or about the

¹ This panel should be aware that in the interests of brevity, the undersigned will not set forth in great detail, date by date, all of the events that transpired that are being provided in this written testimony. However, the panel should be aware that Exhibit 2 contains select pages from the entire claims log provided through discovery in the matter of Sadie Lawson, a legally incapacitated individual, by her guardian, Rebie Britton and Rebie Britton, individually v. Titan Insurance Company, Kathy Norman, and Chris Davis, Case No. 08-116421 NF, which was pending in Wayne County Circuit Court and has since been resolved.

same time, a letter was sent by the adjuster to Dr. Ray to make sure that Dr. Ray was firm in his opinions that Sadie required a barrier-free apartment and a 24 hour nurse, as well as 24 aide care for her recovery. Unfortunately for Sadie, she was forced to stay in a facility by the adjusters at Titan, as they refused to give a pre-approval or to pay for a barrier-free apartment as prescribed by her doctors. In the last facility in which Sadie resided, the doctors advised Sadie's family upon discharge that they would likely have to amputate Sadie's great toe and/or foot due to gangrenous infection that had occurred; they did not believe it could be saved. In addition, she had had numerous infections at her tracheotomy site; she was ventilator dependent and she had a malady of other issues.

The following is a bullet-pointed list of numerous issues that occurred and are noted throughout the claims activity log provided by Titan in the litigation that ultimately led to Sadie receiving her benefits. These bullet-pointed actions clearly evidence the egregious conduct of Titan Insurance Company and its agents, servants and/or employees:

- October 16, 2006 Rebie Britton called to complain about her unhappiness with the facility was in. The claims activity log clearly shows that, "Guardian may be forgetting her role".
- October 23, 2006 Claims activity log evidences that Sadie was admitted to St. John Hospital with a high fever, upper respiratory infection and had lost 10 lbs. This clearly substantiates Sadie's sister, Rebie's earlier concerns about the facility that Titan had arranged for her to be in.
- October 26, 2006 Another claims activity note indicates, "Rebie isn't happy wherever insured is and everyone is out to get her. What is true is that insured did get infections and lose 10 lbs."
- November 21, 2006 claims activity note clearly evidences that Titan Insurance Company is not happy with what Sadie's guardian wants performed in regards to where the care is provided to Sadie. It is at this time that Titan has now decided that maybe it would be worth having Rebie removed as the guardian.
- January 3, 2007 due to Rebie's unwillingness to cooperate with Titan in putting Sadie in a facility of Titan's choosing, Karen Hoover and Dawn Neeley, both of whom are

- management within Titan, have indicated the OK to report Rebie to Adult Social Services and to put Sadie into the Georgian East Nursing Home.
- March 15, 2007 the adjuster had reduced Rebie's guardianship fees of \$50.00 a week by \$10.00, as the adjuster had indicated that Rebie was no longer doing Sadie's laundry. Rebie inquired as to the additional work she was performing as guardian, which this panel should note included going to every singly doctor's appointment, as an ambulance would not transport Sadie without her legal guardian being present, the adjuster advised Rebie that she was not entitled to any more than that.
- June 12, 2007 indicates a conversation with the case manager, where the case manager advised that they were hopeful to move Sadie into a barrier-free apartment with 24 hour care, that this would be more cost effective and that it was the level of care Sadie required, based on her track record of hospitalizations, numerous infections, and the lack of care that she had been receiving prior. The case manager advised the claims adjuster that Dr. Ray was also in agreement with this level of care.
- August 16, 2007 claims activity note indicates a phone call from the claims adjuster to
 the individuals of Hartland of Dorvin seeking their agreement that it was not a good
 idea to place Sadie in an apartment. The note continued on and indicates that an
 apartment would not be cost effective.
- August 17, 2007 note from the insurance adjuster to contact Brown Rehabilitation and reopen the case management file for consulting purposes and rehire Darcy Hoys as Titan's case manager.
- September 14, 2007 claims adjuster sent a letter to Dr. Ray, according to the claims activity log, "making sure" that the insured needed 24 hour nursing and 24 hour home health aides.
- October 9, 2007 entry in the claims activity log indicates "advised that it is up to guardian, but it cannot be an apartment at this time. She needs to be moved to a facility."
- October 19, 2007 evidences the admission of Sadie to the hospital for purposes of potential amputation of her great toe and/or foot. The entry continues to say "the guardian, case manager want her in an apartment. Dr. Ray has not responded to a letter I sent him re this issue".
- October 22, 2007 claims activity log entry states, "letters received from Dr. Ray and Dr. Ellison in support of apartment for insured."
- May 15, 2008 claims activity log entry states, "Titan was advised that the best treatment for claimant would be received in a TBI program, which claimant's guardian refused to do. Claimant guardian has chosen to remove claimant from facility which could take care of her and set her up in an apartment with LPN, RNS and HH aides "...

"we will cover the expense of a facility that would be able to attend to claimant's need, but that will not cover the expense of a subacute facility set up solely for the care of the claimant".

• June 9, 2008 - claims activity log entry states, "This is not cost effective, nor does this fall within the guidelines of the No-Fault Statute, which allows the ACF (Assigned Claims Facility) to pay the lowest amount for the necessary service."

Based on all of the above, I am happy to say that I took over the representation of Sadie Lawson, filed a lawsuit with regard to her outstanding bills with HealthCall of Detroit, for the one-on-one care, which were in excess of a half million dollars. Based on my past dealings with claims of this sort, I have had success with insurance companies such as Titan, State Farm, Allstate and AA A to name a few, whereby the corporate culture itself is corrosive and does not support providing what is best for the insureds, but in fact, is skewed in such a way that there is an incentive for the insurance adjusters to underpay claims, as this directly affects their bank accounts at the end of the year.

Upon filing the lawsuit, a motion to compel was filed, seeking the production of between 60,000 and 100,000 pages of internal documents which set forth this plan to implement corporate-wide fraud against its insureds. This plan would have been put in place based on recommendations of the McKinsey & Company Consulting Firm's recommendation. This panel should note that McKinsey & Company provided consulting services to all of the big insurance companies across this country, which has affected the way that insurance companies pay their insureds for claims. It is geared towards increasing the profits of the insurance companies at the expense of the insureds.

Judge Daphne Means Curtis, Wayne County Circuit Court, granted plaintiff's motion and ordered the appointment of a Discovery Master, ordering Titan to provide all of the documentation which clearly supported plaintiff's lawsuit alleging institutional fraud by Titan

Insurance Company. Shortly after the judge's order was entered, Titan approached plaintiff and this case was settled, for not only the outstanding medical bills, but also for all of the past due and outstanding guardianship fees for services provided by Rebie Britton, that were underpaid since day one. The panel should also note the order entered in court the day the settlement was placed on the record, provided that Titan Insurance Company would pay Rebie Britton at the rate of \$45.00 per hour for all guardianship services, from the date of the settlement forward.

I am happy to report to this panel that due to the actions of Rebie, Mary Johnson, the case manager, Dr. Ray, HealthCall of Detroit, and all of those involved in pushing Titan to get Sadie the care she needs, Sadie has had her tracheotomy removed, she is no longer being fed through a tube and is eating solid foods, and drinking, her contractures are almost resolved, she is conscious and able to communicate verbally, and able to play card games such as Uno. Unfortunately, her head injury is still so severe that she still has deficits and needs an aide and a nurse 24/7 due to her potential to injure herself and others, as well as some other medical concerns. Her life, however, is now a life, and not just a person in a bed, in a coma, who was constantly hospitalized due to the sub-standard care she was being provided, due to Titan's refusal to pay for the care and treatment that was warranted for her injuries.

Lastly, the undersigned would like the panel to know that since the settlement of this matter in February of 2009, the adjuster, Chris Davis, who was sued personally in that action, continues to hinder and be a road block to the treatment, care and continuity of care that Sadie needs. She has refused to pay bills for certain supplies, she has underpaid Rebie Britton for guardianship services and in fact, it took over four (4) months to get any checks from her for guardianship services. HealthCall's bills are going unpaid, yet again. We are the point

where we will have to initiate another lawsuit against Titan Insurance Company and Ms.

Davis.

It is for all of these reasons I hope that this panel seriously consider implementing new

laws that would provide for bad faith actions against these insurance companies. It is not just,

nor right that an insurance company can take a premium from an individual and/or partake in

our no-fault system where they must abide by the Assigned Claims Facility guidelines and

then in the interests of their profits, take shortcuts that directly affect the health and well-

being of their insureds. Maybe if there were some laws on the books that provided for

damages for bad faith, events like this would not happen. Despite the good outcome, it will

still be an ongoing battle and if the legislature, in their infinite wisdom, were to pass laws with

some teeth that would cost these insurance companies money off of their bottom line, we

might not have to fight an ongoing battle and people may be able to get what they are entitled

to.

Thank you for your time.

Respectfully submitted,

3000 Town Center, Suite 1250

Southfield, MI 48075

(248) 356-2010, Ext. 231

Date: July 15, 2009

SADIE LAWSON

Date of Accident: 1/10/2005

Date of Admission	Facility
1/10/2005	Sinai Grace Hospital
2/14/2005	Lakeland
5/18/2005	Sinai Grace Hospital
5/21/2005	Lakeland
9/22/2006	Georgian East/Heartland
10/22/2006	St. John Hospital
10/26/06	Georgian East/Heartland
12/21/2006	St. John Hospital
1/4/2007	Triumph Hospital
3/16/07	St. John Hospital
3/23/2007	Triumph Hospital
4/27/2007	Heartland/Dorvin
6/3/2007	Sinai Grace Hospital
6/12/2007	Heartland/Dorvin
7/13/2007	Sinai Grace Hospital
7/20/2007	Heartland/Dorvin
7/30/2007	Sinai Grace Hospital
8/1/2007	Heartland/Dorvin
8/9/2007	Botsford Hospital
8/21/2007	Heartland/Dorvin
8/27/2007	Sinai Grace Hospital
10/12/2007	Regency Hghts Nursing Home

10/15/2007	Sinai Grace Hospital
10/31/2007	Regency Hghts Nursing Home
11/6/2007 to Present	Apartment/Home

10/12/2006 Balance Claim: Reserve Increased to 859917.34

***** 10/16/2006 09:07:15 KSZCZEPANS *****
PIP HANDLING: RECVD BILL FROM DR REYNOLDS & ASSOC 9/9/05 \$241. REF TO RW.

***** 10/16/2006 14:09:05 KSZCZEPANS *****

PIP HANDLING: RECVD BILL AND REPORT FROM BROWN REHAB DOS 8/23/06-9/22/06 INV# 79368.

UPON RECPT OF FILE CASE MGR CALLED ME AND SISTER/GUARDIAN/REBIE TO ARRANGE TO MEET
FOR CASE CONF AT LAKELAND ON 8/31/06. SHE ARRANGED TO MEET WITH STAFF AND REBIE TO
PERFORM INITIAL EVAL AND EXPLN HER ROLE. REBIE WAS OPEN TO PROVIDE ALL INFO AND
SIGN FORMS. THEY TOOK TOUR OF HEARTLAND AND BON SECOURS. INS HAS NEVER BEEN
RE-HOSPITALIZED SINCE HER ADMITTANCE TO LAKELAND. PAYING INV.

LAST WK: ON 10/10/06 RECVD CALL FROM CASE MGR AS REBIE IS UNHAPPY WITH CARE FACILITY INS IS AT NOW. SHE DOESN'T FEEL THEY CAN CARE FOR INS PROPERLY AND HAS BEEN STAYING ABOUT 12 HRS A DAY. THEY HAVE MET WITH REBIE TO DISCUSS. ADV I WOULD NEED TO

DISCUSS WITH SUPERVISOR TO SEE WHAT WE SHOULD DO. CASE MGR SPK TO A DR WHO FELT THAT INS IS WAKING UP, THIS WOULD BE GOOD TIME TO GET HER TO TBI PROGRAM. REBIE WAS AGAINST AS IT WOULD BE TOO FAR. SPK TO CAT ADJ WHO RECOMMENDED WE HAVE INS EVALUATED BY

DR. CASE MGR TO DECIDE WHAT TYPE OF DR AND LET DR RECOMMEND BEST PLACE FOR INS. GUARDIAN MAY BE FORGETTING HER ROLE. IT IS NOT WHAT IS CONVENIENT FOR GUARDIAN BUT WHAT IS BEST FOR INS. TOTAL PHONE TIME 20 MINUTES.

I CALLED CASE MGR 10/12/06 AND ADV OF SAME.

10/16/2006 Balance Claim: Reserve Increased to 861533.29

***** 10/17/2006 10:34:52 KSZCZEPANS *****
PIP HANDLING: RECVD BILL FROM OAN MED TRANSPORTATION DOS 9/22/06 \$60. THIS IS WHEN
INS MOVED FROM LAKELAND TO GEORGIAN EAST NSG HM. PAYING SAME.

10/18/2006 Balance Claim: Reserve Increased to 861593.29

***** 10/20/2006 09:24:10 KSZCZEPANS *****
PIP HANDLING: RECVD BILL FROM DR MADHAVAN 8/7/06 \$72. REF TO RW.

RECVD VM FROM DARCY/CASE MGR. INS HAS APPT WITH NEUROPSYCH DR ON MON 10/23/06. SHE ADV THAT REBIE IS STILL VERY UPSET AND HAS A LOT OF ISSUES WITH NEW PLACE. DARCY WILL CALL AFTER APPT MON.

***** 10/23/2006 11:52:29 KSZCZEPANS *****
ADVISORY COMMENTS: RECVD VM FROM CASE MGR DARCY. INS HAD APPT TODAY WITH
NEUROPSYCH BUT UNABLE TO ATTEND DUE TO FACT THAT INS WAS ADMITTED TO ST JOHNS LAST
NIGHT WITH HIGH FEVER AND URI. INS HAS LOST 10 LBS. SHE IS GOING TO TRY TO GET TO
HOSPITAL
TODAY TO TALK TO DRS.

RECVD CALL FROM INS SISTER TODAY RE ADMITTANCE TO HOSPITAL AND ALSO TO ADV ME THAT SHE DIDN'T GET HER CK THIS MOS. APOLOGIZED AND ADV I WOULD DO TODAY. DIARY DATE GOT CHANGED.

PAYING REBIE BRITTON FOR LAUNDRY AND GUARDIANSHIP DUTIES FOR MOS OF OCT 2006 \$50 \times 4=\$200.



OF

OXYGEN TO KEEP SATURATION ABOVE 92.

***** 11/14/2006 09:16:38 KSZCZEPANS *****
RECVD BILL FROM BEAUMONT REF LAB 9/11/06 \$77.16.

RECVD BILL FROM GRACE UNIV MED GRP 1/20/05 \$60. REF TO RW.

11/15/2006 Balance Claim: Reserve Increased to 873437.64

***** 11/17/2006 12:40:25 KSZCZEPANS *****

RECVD BILL FROM DYNASPLINT SYSTEMS 9/2/06 \$790. REF TO RW.

***** 11/20/2006 09:16:08 KSZCZEPANS *****
RECVD BILL FROM ST JOHN HOSP 10/22/06-10/26/06 \$15.25. REF TO RW.

11/20/2006 Balance Claim: Reserve Increased to 873563.28

***** 11/21/2006 10:37:48 KSZCZEPANS *****

**** ADVISORY COMMENTS ****

RECVD VM FROM CASE MGR DARCY. NEUROPYSCH DR HAS RECOMMENDED THAT INS SEE A REHAB DR. CASE MGR FEELS GOOD IDEA SO WE HAVE MORE PROOFS IF WE REPORT GUARDIAN TO ADULT WELFARE. R/C AND LMOM THAT I AGREE.

RECVD CALL FROM GUARDIAN, REBIE RE HER CK. ADV I HAD DELAYED IT KNOWING THAT SHE WOULD CALL. I ASKED HER WHY SHE IS UNWILLING TO MOVE INS TO A BRAIN INJ PROGRAM. SHE ADV IT IS TOO FAR AND SHE WOULDN'T BE ABLE TO CK ON INS EVERY DAY TO ENSURE CARETAKERS ARE CARING FOR HER PROPERLY. ADV THAT IS NOT HER JOB. ADV AS RECOMMENDED BY DR WHO TALKED TO HER, SHE NEEDS TO TAKE CARE OF HERSELF TOO AND HAVE A LIFE OUTSIDE OF INS. ADV INS NEEDS THE OPPORTUNITY TO BE REHABBED. ADV NURSING HOME IS JUST

GOING TO TAKE CARE OF HER, THEY DON'T DO REHAB.

ADV I FELT SORRY FOR HER AND INS AS SHE IS NOT WILLING TO GIVE HER A CHANCE. SHE HAD A LOT OF EXCUSES SUCH AS HER BRO/FAMILY THINKS ITS TOO FAR BUT NONE OF THEM VISIT HER. ASKED HER TO HAVE BROTHER CALL ME. PHONE CALL 10 MINUTES.

ISSUING CK FOR LAUNDRY AND GUARDIANSHIP DUTIES \$50X4=\$200 FOR MOS OF NOV 06.

***** 11/21/2006 10:47:38 KHOOVER *****

R/C to clmts sister-upset that adj has held up her reimb check in order for her to call on status and then adj could ask why she would not let her sister go to rehab facility in Ann Arbor. She feeels it is to far for the family and that she wants her

sister to stay near her. She questioned why Ann Arbor - I advised her that I was not familar with her sisters needs however it could be that this was the only facility that was available to handle her sisters needs with availability at this time. I

advised that if she did no want her sister to go to such facility that I would advise adj of same.

***** 11/21/2006 11:01:26 KSZCZEPANS *****
RECVD WEEKLY ASSESSMT FROM HEARTLAND. THEY ARE DOING SOME SPEECH THERAPY WITH HER.
VERY MINIMAL NOTES.

DIARY:

INS IS RESIDING AT HEARTLAND NURSING HOME DUE TO SEVERE TBI. SHE HAS COME OUT OF HER COMA BUT IS NOT ABLE TO SPEAK AND NEEDS ASSISTANCE WITH EVERYTHING. SHE HAS Page 28

SENDING RW 4713532 TO GARY YASHINSKY 2/16/06, TX NOT RELATED. NO DOC SUBMITTED. PYT DENIED.

**** 12/28/2006 13:42:19 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****
SENDING RW 4713525 TO GARY YASHINSKY 1/4/06, 4713530 1/19/06-2/2/06, TX UNRELATED, NO DOC SUBMITTED. 2 EOBS SENT.

***** 01/02/2007 12:33:08 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD 3 BILLS FROM MORRIS GALES MD 11/30/06 \$75, 11/9/06 \$250, 10/19/06 \$250. REF

***** 01/02/2007 12:55:03 KSZCZEPANS *****
RECVD CALL FROM BEVERLY OF ST JOHN. INS IS STILL THERE. SHE WANTED TO KNOW IF I
WANTED TO BE UPDATED ON EVERYTHING THEY ARE DOING AS IT IS DONE OR SHOULD THEY JUST
SEND NOTES WITH BILLS. ADV THEY CAN NOTES WITH BILLS.

***** 01/03/2007 12:51:50 KSZCZEPANS *****

RECVD VM FROM STEPHANIE OF SOCIAL WORK OF ST JOHN HOSP. R/C AND SHE WAS NA. THEY DON'T KNOW WHY SHE CALLED ME, L/MSG TO R/C.

RECVD VM FROM AMY OF HEARTLAND. INS IS READY TO BE D/C AND FAMILY IS LOOKING FOR ANOTHER FACILITY, THEY DON'T KNOW WHY. PAGER 586-309-0024. PAGED HER:

***** 01/03/2007 13:21:28 KSZCZEPANS *****
RECVD CALL FROM JANET OF SOCIAL WORK OF ST JOHN. SHE ADV THAT FAMILY DOES NOT WANT
INS TO RETURN TO GEORGIAN EAST AND HAS GIVEN THEM NAMES OF FACILITIES TO D/C HER TO.
ST JOHN SENIOR ON E WARREN, ST MARYS (LEAST APPROPRIATE FOR HER REHAB) 9 MILE IN
SCS, HENRY FORD BELMONT ON HARPER. IT IS NOT CLEAR IF CASE MGR HAS BEEN NOTIFIED.

I CALLED DARCY AND LMOM ADV OF ABOVE.

***** 01/03/2007 13:58:47 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD 2 BILLS FROM EASTPOINTE RADIOLOGISTS 12/21/06 \$21, 12/22/06 \$22. REF TO RW.

***** 01/03/2007 15:48:48 KSZCZEPANS *****
RECVD VM FROM CHRIS BAKER OF ST JOHN RE FINDING TBI PROGRAM FOR INS. R/C AND REQ
R/C AS WE HAVE CASE MGR.
RECVD CALL FROM CHRIS BAKER. SHE ADV SHE IS CASE MGR OF ST JOHN HOSP. ADV I HAVE
SPKN TO 3 DIFFERENT PEOPLE FROM HOSPITAL. ADV WE WOULD LIKE INS TO GO TO TBI
PROGRAM BUT SISTER HAS REFUSED AS BEING TOO FAR. REF HER TO OUR CASE MGR, DARCY.

***** 01/03/2007 17:06:33 KSZCZEPANS *****

I DISCUSSED CASE WITH KAREN HOOVER AND DAWN NEELY RE WHERE TO D/C INS TO SINCE SISTER/GUARDIAN IS REFUSING TO PUT INS IN TBI PROGRAM. THEY INDICATED OK TO REPORT TO ADULT SOCIAL SERVICES AND FOR TIME BEING INS S/BE D/C TO GEORGIAN EAST.

RECVD VM FROM CASE MGR AND R/C ADV HER OF WHAT HAS BEEN GOING ON.

I CALLED ADULT SOCIAL SERV TO REPORT GUARDIAN NOT WANTING INS TO GO TO TBI PROGRAM DUE TO DISTANCE FROM HER HOME. I SPK TO CHRISTOPHER JACKSON OF ADULT SOCIAL SERVICES OF WAYNE COUNTY. HE ADV GEORGIAN EAST IS GOOD FACILITY, HIS GRANDMA IS THERE. HE INDICATED THAT REBIE (SISTER) MIGHT FEEL RESPONSIBLE FOR BRINGING INS OUT OF COMA. Page 32

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21A00881

RATES, I WAS THEN REF TO JINNY WHO IS HEAD OF NURSING. SHE ADV THEY ARE A SHORT

REHAB. DID GUARDIAN KNOW THIS? ADV I DIDN'T KNOW. EXPLND THE ISSUES GOING ON WITH THIS FILE AND OUR CONCERNS ABOUT THE FACT THAT GUARDIAN WON'T LET INS GO TO TBI PROGRAM. ADV THAT HOSPITAL DIDN'T WANT TO GET INVOLVED IN DISPUTE. EXPLND THAT SOCIAL

SERV HAD BEEN PREV CONTACTED AND THEY ARE POINTING FINGERS SAYING ITS THE OTHER PARTIES RESPONSIBILITY. SHE WANTED TO SPK TO DARCY OUT CASE MGR. SHE DIDN'T KNOW IF THEY ARE THE APPROPRIATE FACILITY FOR INS. ***PHONE 15 MINUTES.

02/22/2007 Balance Claim: Reserve Increased to 936511.95

***** 02/23/2007 11:10:58 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD EMAIL FROM CASE MGR/DARCY. SHE ADV THAT PEGGY GOULD/TRIUMPH CALLED AND SAID
THAT HF ROSEVILLE CHANGED THEIR MIND ABOUT TAKING INS AFTER TALKING TO ME. THEY
WANT SOME DIRECTION ON HOW TO DC INS. CASE MGR DOES NOT EXPECT THEM TO PETITION THE
COURTS TO HAVE INS MOVED TO SPECIAL TREE. I CALLED CASE MGR AND LMOM TO R/C.

FOR SOME DIRECTION. HE ADV ME TO SEND LTR TO TRIUMPH ASKING THEM TO KEEP INS FOR AT LEAST 2 MORE WKS. THE ULTIMATE DECISION IS INS.

***** 02/23/2007 11:19:51 KSZCZEPANS *****
ABOVE CONT'D. I CALLED GUARDIAN, REBIE TO DISCUSS INS GOING TO TBI PROGRAM. SHE HAD A LOT OF EXCUSES SUCH AS INS HAS ALLERGIES, SPECIAL TREE IS DIRTY, HAS ANIMALS. SHE ADV IT IS DARK. ADV WHEN SHE WENT TO VISIT IT WAS NAP TIME AND THAT HAS BEEN EXPLND TO HER. THE CONVERSATION DID NOT GO WELL AND WE ENDED THE CALL.

I DID CALL HER BK AND LMOM ADV THAT WE ALL NEED TO WORK TOGETHER TO GET INS TO BEST PLACE POSSIBLE. INS IS THE MOST IMPORTANT THING HERE.

I CALLED PEGGY GOULD TRIUMPH AND SHE ADV THAT HF CHANGED THEIR MIND BECAUSE OF ME. ADV I WAS ONLY HONEST WITH THEM. REQ FAX # SO I COULD FAX A LTR. SHE ADV SHE L/MSG FOR DARCY. ***PHONE CALL 10 MINUTES

I CALLED HF ROSEVILLE TO CONFIRM THEY ARE NOT ACCEPTING INS. I SPK TO SYLVIA WHO ADV YES, THEY ARE NOT ACCEPTING HER.

RECVD CALL FROM CASE MGR WHO ONLY HAD A FEW MINUTES. ADV WE CANNOT CUT PYT. ADV REBIE INDICATES THAT SPECIAL TREE IS DIRTY ETC. ADV THE ULTIMATE DECISION IS REBIE'S. SHE WILL CALL ME BK.

SLOWELLD KON SANGSTE

SENDING LTR TO TRIUMPH ASKING THEM TO HOLD INS FOR AT LEAST 2 MORE WKS WHILE WE WAIT FOR GUARDIAN TO MAKE DECISION WHERE INS SHOULD BE PLACED.

CC TO CASE MGR AND GUARDIAN. 3 LTRS SENT. ****
FAXED TRIUMPHS TO 313-369-5839.

***** 02/23/2007 12:22:41 KSZCZEPANS *****
I WAS ON LUNCH WHEN FNOL REP CAME TO GET ME WITH GUARDIAN ON PHN ADV IT WAS EMERGENCY. WHEN I ANSWERED MY LINE, GUARDIAN HUNG UP.

**** 02/26/2007 10:22:24 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****

RECVD CC OF LTR SENT BY RW TO HEARTLAND HEALTHCARE SERV 9/22/06-10/20/06 REQ NDC CODES.

RECVD CC OF LTR SENT BY RW TO MACOMB PHYS GRP 1/5/07 REQ CONSULT NOTES.

***** 02/26/2007 10:31:26 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****

RECVD CC OF LTR SENT BY RW TO MACOMB PHYS GRP 1/8/07 REQ HOSP NOTES FROM DR POTTS.

- 21A00881

**** 02/26/2007 10:45:51 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****
SENDING RW 4713526 TO GARY YASHINSKY 1/19/06-3/23/06, SOME TX NOT RELATED, PREV REQ DOC NOT RECVD.

02/26/2007 Balance Claim: Reserve Increased to 936812.87

***** 03/02/2007 09:53:47 KSZCZEPANS *****

RECVD VM FROM WENDY ELLIS OF AUTUMN WOODS IN LIVONIA. THEY WANT TO ADMIT INS. R/C
AND ATTEMPTED TO LV VM. MACHINE CUT ME OFF.

***** 03/06/2007 09:50:53 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD 2 BILLS FROM PULMONARY CRITC CARE ASSOC 1/3/07 \$70, 12/29/06-1/4/07 \$210. REF
TO RW.

ON 3/2/07 I CALLED AUTUMN WOODS AND CONFIRMED THEY ARE NOT ACCEPTING INS DUE TO FACT THEY CANNOT HANDLE HER DUE TO TRACH.

03/06/2007 Balance Claim: Reserve Increased to 937274.77

03/14/2007 Balance Claim: Reserve Increased to 937653.12

03/14/2007 Balance Claim: Reserve Increased to 937707.17

***** 03/15/2007 14:13:00 KSZCZEPANS *****
ON 3/13/07 RECVD VM FROM CASE MGR. SHE SPK TO PEGGY GOULD AT TRIUMPH. INS HAS
ABSCESS. IT MAY BE PULMONARY EMBOLISM. THEY DID CHEST XRAY. SHE IS ON 20% OXYGEN
AND ON TRACH. SHE IS ON ANTIBIOTICS AND HAS TEMP.
WE NEED TO DECIDE SOON WHAT WE MIGHT DO ON THIS. GUARDIAN REFUSES TO ALLOW INS TO
GO TO SPECIAL TREE.

I CALLED CASE MGR TO DISCUSS TODAY, LMOM.

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD FAX FROM CINDY KENNEDY OF HEARTLAND RE PYT DOS 10/26/06-10/31/06 \$2404.27,
12/1/06-12/31/06 \$11,615.39. I FOUND I NEVER RECVD OCT AND DEC WAS AN OVERSIGHT. I
DO NEED MORE INFO ON THE DEC BILL AND THEY ARE CHARGING US FULL PRICE FOR WHILE INS
WAS
IN THE HOSPITAL. I CALLED CINDY KENNEDY AND LMOM TO R/C.

***** 03/15/2007 14:24:59 KSZCZEPANS *****

I CALLED GUARDIAN/REBIE TO DISCUSS IF SHE STILL DOES HER LAUNDRY AS WE WERE PAYING HER. PER CASE MGR SHE DOESN'T DO HER LAUNDRY ANYMORE AS SHE IS USUALLY IN HOSPITAL WEAR. REBIE ADV NOW WAS, NOT THE TIME TO TALK ABOUT THIS AS INS WAS GOING TO HOSPITAL.

I ASKED HOW SHE WAS. SHE TRIED TO GIVE ME TO A NURSE WHO ADV SHE WON'T GIVE OUT ANY INFO. ADV I JUST WAS ASKING HOW INS WAS, NO BIG DEAL. REBIE GOT MAD THAT I WAS REDUCING HER PAY. ADV WE WERE PAYING FOR GUARDIAN DUTIES AND TO DO THE LAUNDRY. SHE ASKED HOW MUCH I WAS GOING TO REDUCE MONEY BY. ADV \$10 A WK. SHE ADV THAT IS NOT ALL SHE DOES FOR INS. SHE PAYS HER BILLS AND WHAT ABOUT ALL SHE HAS DONE FOR HER EVERY DAY. ADV WE DON'T PAY HER TO VISIT INS. I ASKED IF SHE HAS FOUND A FACILITY YET.

SHE ADV THAT SHE HAD A PLACE AND SOMEONE CHANGED THE MIND OF THE FACILITY. ADV THE FACILITIES SHE HAS FOUND HAVE NOT BEEN EQUIPPED TO TAKE INS. I TOLD HER THAT I HOPED INS GOT BETTER AND ENDED CALL.

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***PHONE 10 MINUTES

PAYING GUARDIAN \$40 A WK FOR GUARDIANSHIP ONLY FOR MOS OF MARCH 07.

RECVD CALL BK FROM CINDY OF HEARTLAND. ADV THAT I DIDN'T KNOW THERE WAS A 2ND OCT BILL. I JUST RECVD IN HER FAX. ADV DEC BILL WAS NOT PAID IN ERROR BUT I AM UNABLE TO PAY AS I NEED MED/SURG SUPPLIES INFO AND I WILL NOT PAY FULL PRICE FOR BED HOLD RATE. SHE ADV THAT WAS FINE. SHE ADV SHE SPK TO ME IN JAN 07 AND I ADV HER I HAD EVERYTHING I NEEDED. ADV I MADE AN ERROR. WE ARGUED. APOLOGIZED TO HER ADV THAT I JUST GOT OFF PHN WITH SISTER/GUARDIAN. SHE WILL FAX REQ INFO SO I CAN GET THIS PAID.

*****PHONE 10 MINUTES

***** 03/15/2007 14:54:18 KSZCZEPANS *****

DIARY:

INS SUFFERED A SEVERE TBI AND WAS IN COMA SINCE DOL. SHE STARTED COMING OUT OF IT APPROX 5/06. SISTER IS GUARDIAN AND HAS VISITED INS EVERY DAY. INS WAS AT LAKELAND SINCE DOL AND WAS NEVER IN THE HOSPITAL. GUARDIAN HAD ISSUES WITH LAKELAND AND HAD INS MOVED TO HEARTLAND. INS CASE TOO HIGH MAINTENANCE AND INS HAS BEEN IN/OUT OF HOSPITAL SINCE WITH TRACH INFECTIONS, UTI ETC. SINCE INS COMING OUT OF COMA AND THE NEXT LOGICAL STEP IS TO MOVE TO TBI PROGRAM. THERE AREN'T THAT MANY. GUARDIAN REFUSES

TO PUT INS IN TBI PROGRAM. SHE HAS MANY REASONS. WE HAVE DR RX INS TO BE IN TBI PROGRAM. INS HAS BEEN AT TRIUMPH FOR A FEW MOS BUT THEY ARE JUST A TEMP FACILITY. INS GOING BK INTO HOSPITAL TODAY FOR POSSIBLE PULMONARY EMBOLISM. WHEN SHE GETS OUT TRIUMPH WILL ONLY TAKE TEMPORARILY. WE MAY HAVE TO STEP IN. WE PREV REPORTED TO ADULT SS AND THEY ADV THEY WOULD STEP IN BUT THEN CHANGED THEIR MINDS AND ADV IT WAS HOSPITAL'S JOB TO DO SO. I WILL BE TALKING TO RON SANGSTER ON THIS. CASE MGR CONTINUES TO ATTEMPT TO COORDINATE CARE. CLM PENDING. NO SUBRO.

***** 03/15/2007 15:06:31 KSZCZEPANS *****
REVIEWED 12/1/06 BILL FROM HEARTLAND AGAIN AND FOUND I DID HAVE NECESSARY INFO. I
AM PAYING 1/2 OF THE BED HOLD RATE. RX PORTION WILL GO TO RW FOR REVIEW. PAYING
DOS 12/1/06-12/31/06 CONTROL #8109.

***** 03/15/2007 16:01:01 DNEELY *****
Reviewed check for payment, approving same.

03/15/2007 Balance Claim: Reserve Increased to 937867.17

***** 03/16/2007 14:20:59 DNEELY ***** Recd vm from clmt guardian, Rebie. Returned call and spoke with Rebie. she could not talk and stated she would try to call me w/i 30 minutes.

03/16/2007 Balance Claim: Expense Reserve Increased to 20572.62

***** 03/19/2007 10:12:52 DNEELY *****
Reviewed check for payment, approving same.

***** 03/19/2007 16:22:54 KSZCZEPANS *****
RECVD CALL FROM STACY OF ST JOHN INQ IF CLM OPEN. UNK DIAG. INS IS STILL THERE.

03/19/2007 Balance Claim: Reserve Increased to 947291.47

***** 03/20/2007 13:27:05 KSZCZEPANS *****

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***** 05/25/2007 10:59:10 KSZCZEPANS *****
RECVD VM FROM JENNIFER OF TRIUMPH INQ IF FAX RECVD AS THERE WAS 80 PAGES. R/C AND SUPPLIED HER WITH GREG'S INFO AT RW.

***** 05/29/2007 10:15:33 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD 7 BILLS FROM PULMONARY CRIT CARE 4/19/07-4/24/07 \$280, 4/14/07-4/15/07 \$140, 4/16/07-4/18/07 \$210,4/27/07 \$70, 4/21/07-4/22/07 \$140, 4/25/07-4/26/07 \$140. REF TO RW.

**** 05/30/2007 09:55:32 KSZCZEPANS *****

RECVD VM FROM GREG/RW. HE HAS ? ABOUT THE BILL FROM TRIUMPH. HE NEEDS ITEMIZATION. HE SAID THERE WAS ABOUT \$30,000 THAT HE WOULD HAVE TO CODE 29. ADV I COULD CALL JENNIFER FROM TRIUMPH. IN TALKING FURTHER, HE FOUND HE HAS WHAT HE NEEDS. THERE IS ABOUT 1000 PAGES OF INFO. HE WILL REVIEW BILL.

05/30/2007 Balance Claim: Reserve Increased to 1073466.93

***** 05/31/2007 09:44:14 KSZCZEPANS *****

RECVD EMAIL AND VM FROM CASE MGR THAT SHE RECVD NOTICE FROM ATTY THAT THEY HAVE HIRED A NEW CASE MGR. R/C AND LMOM TO R/C TO DISCUSS.

**** 06/01/2007 10:32:32 KSZCZEPANS ****

RECVD FAX FROM CASE MGR WHICH IS CC OF LTR SENT TO HER BY GUARDIAN'S ATTY ADV THAS OF 5/22/07 GUARDIAN OBTAINED A NEW FACILITATOR TO PROVIDE CASE MGT TO INS. CASE MGR ALSO INDICATES THAT INS HAS APPT WITH DR RAY ON 6/7/07 @ 1PM.

RECVD VM FROM CASE MGR AND R/C. SHE HAD CONTACTED NURSING HOME FOR STAT ON INS AND THEY FAILED TO R/C. SHE THEN RECVD LTR FROM INS ATTY. SHE ADV SHE INFORMED NURSING HOME OF INS APPT WITH DR RAY. CASE MGR WILL BE CLOSING HER FILE.

***** 06/01/2007 16:19:26 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL AND REPORT FROM CASE MGR/DARCY 3/6/07-4/16/07 \$1450.20 INV# 84254. AT THAT TIME INS WAS STILL AT TRIUMPH. SHE HAD BEEN REHOSPITALIZED FOR REMOVAL OF PEG TUBE AND ANOTHER INSERTED FOR SEPSIS.

DR RAY/PMR CONTINUES TO SEE INS AT TRIUMPH ON REG BASIS. HE CONTINUES TO RECOMMEND TBI PROGRAM. CASE MGR HAS HAD NUMEROUS CONTACTS WITH ME, GUARDIAN, PROVIDERS. PAYING INV.

06/01/2007 Balance Claim: Reserve Increased to 1074917.13

***** 06/04/2007 13:14:58 KSZCZEPANS *****

RECVD CALL FROM JENNIFER OF TRIUMPH. GREG/RW HAS NOT R/C. ADV I DON'T HVE BILL BK YET. GAVE HER HIS SUPERVISOR INFO.

**** 06/05/2007 10:47:07 KSZCZEPANS *****

RECVD EMAIL FROM CASE MGR/DARCY THAT SHE WAS NOTIFIED THAT INS IS HOSPITALIZED AGAIN FOR SEPSIS.

***** 06/06/2007 12:45:27 KSZCZEPANS ****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD 2 BILL FROM LAKESHORE GASTROENTROLOGY 3/7/07-3/8/07 \$535, 3/25/07-3/31/07 \$775. REF TO RW.

***** 06/06/2007 15:35:56 KYURKIE *****

21A00881 I FOUND OUT INS WAS HOSPITALIZED AS OF FRI AND IS STILL IN. SHE HAS 105 TEMP.

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD REPORT AND BILL FROM NEW CASE MGR MARY JOHNSON 5/22/07-6/29/07.

CASE MGR DID INITIAL EVAL. SHE ASSESSED CLIENT AND NEEDS. ON 6/3/07 SHE RECVD CALL FROM REBIE ADV THAT INS WAS HOSPITALIZED WITH SOME TYPE OF INFECTION. INS D/C 6/12/07. AMT DUE \$927. PAYING SAME.

I CALLED NEW CASE MGR TO DISCUSS THIS FILE. ADV THAT REPORTING IS NOT SATISFACTORY.

ADV I WOULD APPRECIATE BEING KEPT UP TO DATE ON THE HOSPITALIZATIONS. WHAT THEY
ARE HOPING TO DO IN FUTURE IS MOVE INS TO HANDICAP APT AND HAVE 24 HR CARE. THEY
FEEL

SHE HAS BEEN HOSPITALIZED SO MANY TIMES DUE TO INFECTIONS IN HOSP. I FEEL IT WAS POOR CARE AND BEING MOVED SO MUCH. WE MOVED INS AT GUARDIAN REQ 2X NOW. PRIOR TO THAT SHE WAS AT LAKELAND FOR 1 1/2 YRS WITH NO HOSPITALIZATION. SHE FEELS THE APT WOULD

BE MORE COST EFFECTIVE AND INS WOULD GET BETTER CARE. SHE ADV DR RAY AGREES ALSO. ADV SINCE THEY ARE EXPECT US TO PAY FOR HER SERVICES, WE NEED TO BE KEPT MORE UP TO DATE.

**PHN 10 MINUTES

***** 07/16/2007 14:32:53 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

PAYING GUARDIAN FEES FOR MOS OF JULY 2007 \$40 X 4 WKS=\$160.

SENDING LTR THAT REINSTATEMT OF LAUNDRY IS PENDING RESPONSE FROM FACILITY.

***** 07/16/2007 14:37:36 KSZCZEPANS *****
ABOVE CON'TD. THE PYT IS FOR MOS OF JUNE 2007.

07/16/2007 Balance Claim: Reserve Increased to 1250058.42

***** 07/17/2007 10:09:48 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD 2 BILLS FROM HCR MANOR CARE MED SERV 4/27/07 \$65, 5/1/07 \$65. REF TO RW.

**** 07/20/2007 12:17:39 KSZCZEPANS *****

RECVD EMAIL FROM CASE MGR THAT INS WAS TO BE D/C 7/19/07. SHE HAS SEPTICEMIA.

RECVD VM FROM ANTHONY/SINAI REQ BILLING INFO. R/C AND N/A, NO MACHINE.

RECVD EMAIL THAT INS D/C WAS DELAYED. SHE SHOULD BE D/C TODAY.

RECVD VM FROM CHRIS/HEARTLAND THAT INS TO BE RETURNING TO THEM ONCE D/C. SHE HAS BEEN UNABLE TO REACH CASE MGR.

***** 07/20/2007 13:53:26 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD 3 BILLS FROM MORRIS GALES MD 5/25/07 \$125, 6/1/07 \$125, 6/15/07 \$125. REF TO RW

07/20/2007 Balance Claim: Reserve Increased to 1256708.42

**** 07/23/2007 11:19:18 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD BILL FROM METRO HEALTH CARE 6/3/07 \$457. REF TO RW.

***** 08/15/2007 09:52:13 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM HCR MANOR CARE MED SERV 6/13/07 \$65. REF TO RW.

08/15/2007 Balance Claim: Reserve Increased to 1267416.62

08/15/2007 Balance Claim: Expense Reserve Increased to 43058.10

***** 08/16/2007 13:13:19 KSZCZEPANS *****
REVIEWED FILE. I CALLED DORVIN RE LAUNDRY SITUATION. I SPK TO JEROME WHO ADV CASE
MGR WAS SUPPOSED TO CALL ME. HE DIDN'T KNOW CASE MGR NAME. REF TO RECPT WHO ADV IT
WOULD BE CHRIS OR DONNA @ 248-592-1052.
CALLED AND SPK TO CHRIS. SHE ADV THAT GUARDIAN DOES NO LAUNDRY FOR INS. INS HAS NO
PERSONAL LAUNDRY CURRENTLY. WE DISCUSSED INS STAT. ADV THAT HOSPITAL TRYING TO
WEAN HER OFF. IF INS IS WEANED OFF OR ON OXYGEN OF 4LITERS, THEY CAN TAKE HER BK.
IF
VENT OR HIGHER THAN 4 LITERS, SHE WILL NEED TO GO TO VENT FACILITY. WE BRIEFLY
DISCUSSED INS GOING TO AN APT. SHE AGREES NOT A GOOD IDEA. THE STAPH INFECTION
THAT INS HAS SHE GOT FROM HOSPITAL AT ONE POINT. IT IS DUE TO HER COMPROMISED
HEALTH STAT.

IT IS NOT DUE TO CARE. ALSO APT W/NOT BE COST EFFECTIVE. SHE BROUGHT UP CHRISTOPHER REEVES AND ALL THE \$ HE HAD. HE DIED FROM INFECTION DUE TO BED SORE.
***PHN 30 MINUTES

I CALLED BERNIE HORAN @ BOTSFORD TO GET INS STAT. SHE ONLY HAD A MOMENT TO TALK. SHE DIDN'T HAVE FILE WITH HER. SHE COULDN'T COMMENT ON TEMP. THEY ARE TRYING TO WEAN INS OFF VENT TODAY.**PHN 15 MIN

***** 08/16/2007 13:59:51 KSZCZEPANS *****
PAYING GUARDIAN FEES \$40 WK X 4 FOR MOS OF AUG 2007 TO REBIE BRITTON.
SENDING DENIAL LTR FOR REQ FOR INCREASE AS SHE IS NOT DOING INS LAUNDRY PER
FACILITY. ****1 LTR SENT.

***** 08/16/2007 14:02:36 KSZCZEPANS *****
UNABLE TO ISSUE ABOVE CK DUE TO LACK OF SOCIAL SECURITY # OF REBIE BRITTON. WILL ADD THAT REQ FOR SS# TO ABOVE LTR.

08/16/2007 Balance Claim: Reserve Increased to 1268365.90

***** 08/17/2007 09:30:13 KSZCZEPANS *****

ON 8/16/07 SPENT 2 HRS IN MTG WITH GUARDIAN, CASE MGR MARY JOHNSON AND ATTY CHIKETA PALMORE. RON ABV ME TO HIRE BK PREV CASE MGR, DARCY HOYES AS / CONSULTANT ON THIS FILE.

THEY ARE REQ THAT WE MOVE INS TO APT IN HARRISON TWP. RENT FOR 1 YR LEASE IS \$900, 3 MOS LEASE IS \$1000 A MOS. MODS: SMALL RAMP, ROLL IN SHOWER, CARPET REMOVED AND FLR INSTALLED, SHELVING INSTALLED IN BEDRM FOR STORAGE OF DME SUPPLIES, AIR PURIFICATION SYSTEM. 24 HR NURSING, OT, PT AS NEEDED, COG THERAPY AS NEEDED.

CASE MGR INDICATES THAT AG SHE WANTS TO USE CHARGES \$56-60 AN HR. I AM GOING TO RESEARCH IN TALKING TO DEB CONKLIN RE AVG COSTS. DOES INS NEED 24 HR NURSING.??

I CALLED DARCY HOYES AND LMOM ADV WE NEED TO HIRE HER BK AS CONSULTANT ON THIS FILE.

SPENT 1 HR ON INTERNET RESEARCHING BARRIER FREE APTS ON MACOMB COUNTY**

RECVD LTR FRM SOCIAL SECURITY RE INFO. NO RELEASE ATTACHED. Page 61

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD BILL FROM DORVIN 7/20/07-7/30/07 \$3609.74 FOR RESIDIENTIAL, SUPPLIES/OTHER.
PAYING RESIDENTIAL ONLY.

SENDING 1 LTR REQ NOTES, ITEMIZATION OF SUPPLIES ETC. ****

***** 08/17/2007 09:38:22 KSZCZEPANS *****
I DISCUSSED WITH GUARDIAN THAT WE NEED HER SOCIAL SECURITY # TO ISSUE CK FOR
GUARDIAN FEES. I EXPLND THAT I HAD BEEN MISTAKEN AND IT IS TAXABLE. SHE INQ ABOUT
REINSTATING LAUNDRY FEES. I ADV THAT I CKD WITH DORVIN AND THEY ADV THAT THEY DO
LAUNDRY.
SHE ADV THEY ARE LYING.

I CALLED CHRIS/DORVIN AGAIN TO DISCUSS. SHE ADV THAT THEY DON'T NORMALLY DRESS TRACH PATIENTS OR INCONTINENT PATIENTS. IF THEY EVER DID IT WAS AT THE INSISTENCE OF GUARDIAN. SHE WILL CK.

RECVD CALL FROM CHRIS/DORVIN. THEY RARELY DRESSED INS. THEY ALSO DO INS LAUNDRY AS THERE IS NO CHARGE TO US FOR LAUNDRY.

***** 08/17/2007 10:05:02 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM CASE MGR M JOHNSON & ASSOC 7/3/07-7/31/07 \$1107. SHE HAS NUMEROUS PHN CALLS WITH GUARDIAN. SHE HAS CALLS WITH DORVIN RE CONCERNS ON INS CARE. SHE HAS BEEN RESEARCHING SUITABLE APTS FOR INS AND VISITING THEM. PAYING INV.

***** 08/17/2007 10:46:47 KSZCZEPANS *****
I CALLED BROWN REHAB AND SPK TO DEANNA AND ASKED THAT THEY REOPEN CASE MGT FILE FOR CONSULTING PURPOSES.

RECVD LTR FROM SOCIAL SECURITY INQ IF WE HAVE ISSUED A SETTLEMT TO INS. ADV NO. HAD FORM WITNESSES AND MAILED BK.

***** 08/17/2007 11:06:14 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****
RECVD BILL FROM PULMONARY & CRIT CARE 8/13/07 \$360. REF TO RW.

***** 08/17/2007 16:01:35 KSZCZEPANS *****

RECVD CALL FROM LORI WINTERS/CASE MGR OF BOTSFORD HOSP. INS IS OFF THE VENT AND SO FAR DOING WELL. FAMILY DOES NOT WANT INS TO GO BK TO DORVIN. THEY ASKED HER TO CALL ME FOR OK TO HAVE HER GO TO HENRY FORD VILLA AS APT ISSUE NOT YET RESOLVED. SHE MAY

BE READY FOR D/C ON MONDAY. ASKED IF I COULD CALL HER BK. SUPERVISOR NA.

TRIED CELL PHN NA. I TRIED TO REACH CONSULTANT CASE MGR NA. I JUST
NEEDED TO THROW IT OFF SOMEONE. I DISCUSSED WITH PAM KING AND SHE ADV ME THAT IF I
AM NOT
COMFORTABLE BEING WHAT HAS BEEN GOING ON RECENTLY TO ADV MS WINTERS OF THAT. I WILL
BE OFF MONDAY.

I R/C AND ADV MS WINTERS THAT I AM NOT COMFORTABLE AT THIS TIME WITH INS GOING TO YET ANOTHER NURSING HOME SINCE WE MAY POSSIBLY PUT HER IN APT. SHE UNDERSTOOD AND WILL LET ME KNOW IF INS HAS BEEN RETURNED TO DORVIN OR IS STILL WITH THEM.

RECVD CALL BK FROM CASE MGR. SHE AGREED TO HAVE INS GO BK TO DORVIN FOR NOW.***PHN 15 MINUTES-1 CALL



08/17/2007 Balance Claim: Reserve Increased to 1272972.90

***** 08/20/2007 11:29:52 CDAVIS ***** VM FROM LAURIE WINTERS CM AT BOTSFORD HOSPITAL / SHE WANTED TO KNOW IF CLMT CAN BE RELEASED BACK TO NURSING HOME AS SHE IS READY TO BE DISCHARGED TODAY. REVIEWED NOTES. APPEARS SHE AND KATHY AGREED ON 08/17/07 CLMT COULD BE RELEASED TO DORVIN R/C OF MS WINTERS. ADV AFTER REVIEWING KATHY'S NOTES THE CLMT IS AUTHORIZED TO RETURN TO DORVIN AS PLACING THE CLMT IN AN APT IS PENDING.

***** 08/20/2007 15:35:04 CDAVIS *****

T/C FROM LORI WINTERS CM AT BOTSFORD HOSPITAL SHE SAID THE CLMT SISTER IS NOT ALLOWING THE CLMT TO BE RELEASED TO DORVIN/ THEY SAID SHE IS ESSENTIALLY RELEASED FROM BOTSFORD AND SOMEONE WILL BE RESPONSIBLE FOR THE CHARGES AS LONG AS THE CLMT IS THERE

AND HAS BEEN RELEASED. DISCUSSED WITH PAN KING. SHE REFERRED ME TO HE HAS RECD A LETTER FROM CLMT SISTER'S ATTY AS TO HOW IT WAS DORVIN FAULT RE THE ...
INSECTION. CONTACTED ATTY RON SANGSTER HE DICTATED A LETTER TO THE ATTY STATING THE CLMT MUST BE RELEASED. HE SUGGESTED IF CLMT SISTER INSISTS THE CLMT NOT BE PLACED AT DORVIN WHERE ARE THEY SUGGESTING THEY BE PLACED. HE SUGGESTED TO THEM HENRY : PORD VILLA ASKING FOR A RESPONSE IN WRITING: HE AGAIN STATES AN APT SETTING IS NOT

A VIABLE ALTERNATIVE FOR AT LEAST SHORT TERM. HE ALSO STATED TITAN WILL NOT BE RESPONSIBLE FOR ADDITIONAL HOSPTIAL CHARGES INGURRED BY ANY DELAY CAUSED THE CLMT SISTER.

***** 08/21/2007 10:06:23 KSZCZEPANS ***** ***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM HCR MANOR CARE SERV 5/24/07 \$45. REF TO RW.

***** 08/21/2007 10:43:25 KSZCZEPANS *****

RECVD VM FROM DONNA OF HEARTLAND/DORVIN THAT INS WAS READY FOR D/C AND PENDING SISTER'S APPROVAL W/BE COMING BK TO THEM.

***** 08/21/2007 10:45:26 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM PULMONARY & CRIT CARE SPEC 8/14/07 \$360. REF TO RW.

***** 08/21/2007 10:51:38 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM METRO HEALTH CARE 8/9/07 \$481. REF TO RW.

***** 08/21/2007 14:44:09 KSZCZEPANS *****

RECVD CALL FROM LAURIE OF BOTSFORD THIS AM THAT INS IS STILL THERE. SHE ADV THAT BOTH NURSING HOMES THAT GUARDIAN REQ HENRY FORD DON'T HAVE BED AVAILABLE. GUARDIAN INDICATED THERE IS NO WAY INS IS GOING BK TO DORVIN. LAURIE HAS EXPLND TO HER THAT SINCE INS WAS READY FOR D/C STERDAY THAT SHE WILL BE LIABLE FOR HOSPITAL COSTS AS INS NO LONGER NEEDS THAT TYPE OF CARE. I ASKED IF SHE SPK TO CASE MGR/MARY JOHNSON. ALL MARY INDICATED THAT SHE WOULD TALK TO GUARDIAN. LAURIE INDICATED THAT IF INS IS NOT MOVED BY THIS AFTERNOON, THEIR LEGAL DEPT WOULD PROBABLY BE CONTACTING US (AS THEY DO NOT WANT TO BE IN MIDDLE OF THIS.
ADV I WOULD TALK TO OUR COUNSEL.***PHN 1 CALL 10 MINUTES

WE BRAINSTORMED AND HE INDICATED WE NEED TO KEEP PRESSURE ON GUARDIAN TO FIND A PLACE UNTIL APT ISSUE IS RESOLVED. HE INDICATED I MIGHT WANT TO ADV BOTSFORD THAT WE WILL PAY COSTS UP TIL TOMORROW AT 5PM BUT NOT TO

GUARDIAN AS WE WANT TO KEEP THE PRESSURE ON FOR THEM TO FIND A PLACE: HE ALSO SUGGESTED T GALL MARY JOHNSON AND OUR CASE MGR DARCY.****15 MINUTES MTG

21:A00881

MS PALMORE/GUARDIAN ATTY CALLED TO INDICATE THAT APPARENTLY (I AM INSISTING) INS GO BK TO DORVIN. ADV THAT IS INCORRECT. ADV I HAVE BEEN PLAYING PHN TAG WITH MICHELLE @ SINAI THAT DECISION ON WHERE INS GOES IS UP

TO GUARDIAN. WE JUST ASK THAT THEY MAKE SURE FACILITY IS EQUIPPED TO HANDLE INS NEEDS. ADV I JUST GOT OFF PHN WITH ROSEANNE AT TRIUMPH ADV WE DO NOT PREAUTH, WE PAY R/C AND EXPLND WHY LAST BILL NOT YET PAID. SHE WILL LET RON KNOW.

**** 09/14/2007 14:41:20 KSZCZEPANS ***** REVIEWED TO PAY GUARDIAN MONTHLY PYT. SHE HAS NOT YET SUPPLIED HER SOCIAL SECURITY#.

****SENDING 1 LTR REQ SAME, AGAIN.

**** 09/14/2007 14:42:12 KSZCZEPANS ***** RECVD EMAIL FROM CASE MGR/DARCY/OURS RE SENDING LTR TO DR RAY TO MAKE SURE IF INS W/NEED 24 NURSING OR 24 HHA CARE. SHE ALSO ADV SHE WOULD HAVE INFO TO ME RE APT VERY SOON.

SENT EMAIL BK ADV I WOULD SEND DR RAY SOMETHING RE SAME.

SENDING DR RAY AC FORMS IN RELATION TO IF WE PUT INS INTO APT SETTING.** 1 FORM LTR SENT

***** 09/14/2007 15:14:24 KSZCZEPANS ***** ***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM METRO HELATH CARE 8/25/07 \$545, ACCT#7-17276. PAYING SAME.

***** 09/14/2007 15:27:17 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM CASE MGR M JOHNSON & ASSOC 8/1/07-8/31/07 \$1278. INS WAS ADMITTED TO SINAC 7/30/07-8/1/07 W/HIGH FEVER UNK CAUSE. D/C BK TO DORVIN. INS ADMITTED TO BOTSFORD HOSP 8/9/07-8/21/07 WITH PNEUMONIA. D/C BK TO HEARTLAND. INS ADMITTED TO SINAI 8/21/07 TO PRESENT WITH FEVER OF UNK ORIGIN. SHE HAS BEEN HOSPITALIZED 6X SINCE 5/07. SHE CONTINUES WITH WOUNDS TO RT LOWER EXTREMITY AS RESULT OF IMMOBILIZATION AND INFREQUENT POSITION CHANGES ACQUIRED DURING JUNE HOSPITALIZATION. SHE CONTINUES

WITH PREV WOUNDS TO LT LOWER EXTREMITY ACQUIRED WHILE AT CURRENT NURSING FACILITY AS RESULT OF INFREQUENT POSITION CHANGES. PAYING INV.

***** 09/14/2007 15:40:39 KSZCZEPANS *****

**** PIP: EVAL OF DAMAGES/INJURIES ****

RECVD 2 BILL FROM HHCC DORVIN 7/20/07-7/30/07 \$5894.44, 7/1/07-7/13/07 \$6534.93. PAYING ONLY ROOM/BOARD. THEY HAVE SUPPLIED NO NOTES.

*****SENDING LTR REQ NOTES.

09/14/2007 Balance Claim: Reserve Increased to 1276466.89

***** 09/14/2007 17:11:28 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM LEONARD ELLISON JR MD 5/3/07 \$140. REF TO RW.

***** 09/14/2007 17:32:26 KSZCZEPANS *****

**** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM COMMUNITY EMS 8/21/07 \$336. PAYING SAME.

***** 09/17/2007 14:07:41 KSZCZEPANS *****

***** LITIGATION MANAGEMENT *****

CVD BILL FROM

8/16/07-8/31/07 ACCT#1-7139M, STATEMT 3795. PAYING

***** 09/17/2007 15:12:55 DNEELY *****

- 21A00881

10/2/07. HE WAS LVG OFFICE FOR FUNERAL AND WAS OUT OF OFFICE REST OF DAY. HE WAS IN SEMINAR ON 10/4/07. HE WOULD TRY TO SPK WITH ME ON 10/5/07.

RECVO LTR FROM CON SUPERIOR ATTACHING LTR FROM DR RAY RE INS NEED TO LIVE IN APT WITH 24 HR CARE. AFTER I REVIEW HE ASKS ME TO STOP BY HIS OFFICE TO DISCUSS EDRIHER.

10/08/2007 Balance Claim: Reserve Increased to 1285834.53

***** 10/09/2007 12:07:47 KSZCZEPANS *****
I STILL HAVE NOT HEARD BK FROM JENNIFER OF SINAI RE MOVING INS. PAGED AND LMOM ON VM.

***** 10/09/2007 12:24:04 KSZCZEPANS *****
I RECVD CALL FROM JUDY SOCIAL WORKER. JENNIFER ASKED HER TO CALL ME AS SHE WAS BUSY. I ASKED ABOUT STAT OF MOVE. INS IS STILL THERE. I ADV THAT INS HAS BEEN READY TO BE D/C SINCE APPROX 9/18/07. THIS IS UNACCEPTABLE AND SHE NEEDS TO BE

MOVED TODAY.
SHE ASKED WHERE. ADV IT IS UP TO GUARDIAN BUT IT CANNOT BE AN APT AT THIS TIME.
SHE NEEDS TO BE MOVED TO A FACILITY. SHE ADV SHE WOULD CALL REBIE/GUARDIAN AND GET
A PLACE. IF SHE DOESN'T PROVIDE ONE, THEY WILL PICK ONE.
***PHN 15 MINUTES

***** 10/09/2007 15:34:06 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD 2 BILLS FROM BOTSFORD MED IMAGING 8/9/07-8/16/07 \$108, 8/11/07 \$442. REF TO RW.

***** 10/10/2007 08:57:39 KSZCZEPANS *****
ON 10/9/07 I CALLED JUDY AGAIN AND LMOM RE STAT OF INS MOVE.

RECVO COPY OF LTR FROM THAT GUARDIAN ATTY SENT THREATENING SUIT IF I AM NOT REMOVED FROM FILE. REF TO DAWN NEELY AS RON WANTS TO MEET WITH KH, DAWN AND ME.

***** 10/10/2007 10:44:20 KSZCZEPANS *****
I CALLED JUDY/SINAI AGAIN RE STAT OF INS MOVE.

***** 10/10/2007 14:05:05 KSZCZEPANS *****
I HAVE NOT RECVD RESPONSE ON THIS. PAGED SUPERVISOR/JENNIFER/SINAI/SOCIAL WORKER RE STAT OF INS MOVE.

***** 10/10/2007 14:33:56 DNEELY *****
Approved check for Triumph.

10/10/2007 Balance Claim: Reserve Increased to 1286074.62

10/10/2007 Balance Claim: Expense Reserve Increased to 44712.87

***** 10/11/2007 16:01:53 DNEELY ***** Recd vm from Darcy in regards to obtaining written confirmation from nursing facilities.

Returned call to Darcy, left message to return my call.

Called Sinai Grace at 313-966-1788 and left message for Barb in order to request progress notes, etc for nursing homes review.

- 21A00881

Beeped Barb at 313-440-0305.

3 calls

***** 10/11/2007 16:34:24 DNEELY *****
Recd call back from Barb at Sinai Grace. Adv that she can expect call from Darcy regarding our need of documentation being forwarded to facilities in order to verify that they can take Sadie in. She is fine with providing this information and will expect Darcy's call.

Called Darcy and provided Barb's information on vm, indicating that Barb is expecting call from her.

2 calls

10/11/2007 Balance Claim: Reserve Increased to 1373064.30

***** 10/12/2007 10:58:06 KSZCZEPANS *****

RECVD CALL FROM OMNICARE CONTINUING CARE/STEPHANIE ADV THEY ARE WILLING TO TAKE INS.

ADV OPEN CLM, WE PAY AT R/C, WE DO NOT COVER DIABETES TX.

RECVD CALL FROM REGENCY HGTS NURSING HOME IN DETROIT. THEY ARE WILLING TO TAKE INS. ADV OPEN CLM, WE PAY AT R/C, WE DO NOT COVER DIABETES TX. THEY CHARGE \$175 DAILY AND EXTRA FOR SUPPLIES. SHE ASKED ABOUT BILLING. ADV I NEED ALL NOTES RELATING TO TX AND SUPPLIES, ALSO NEEDS TO BE ITEMIZED.

***** 10/12/2007 12:59:19 KSZCZEPANS *****
RECVD REFUND CK FROM DETROIT MACOMB HOSP FOR DOS 3/12/07 \$250.67. THEY WERE PAID TWICE. REF TO MATTIE HATCHER.

***** 10/12/2007 13:22:54 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM FARMINGTON EMERG MED 8/9/07 \$998. REF TO RW.

RECVD VM FROM JUDY/SINAI THAT INS IS BEING MOVED TO REGENCY HGTS AND TO CALL HER. CALLED HER AT 313-966-5319. NA, NO MACHINE.

***** 10/15/2007 14:42:11 KSZCZEPANS *****

RECVD CALL FROM BILLER OF HEARTLAND RE WHAT I NEED FOR OUTSTANDING JULY 07 BILL.

ADV I NEED NOTES AND ITEMIZATION OF SUPPLIES. SHE WAS NOT AWARE OF OTHER BILLS NOT PAID. EXPLND WHAT I NEEDED. SHE WILL MAIL SAME.

***** 10/15/2007 15:43:25 KSZCZEPANS *****

RECVD VM FROM SUE AT BOTSFORD RE BILL FOR \$55K DOS 8/9/07-8/21/07. R/C AND LMOM
THAT CK SHOULD BE GOING OUT THIS WK AND AMT IS \$35K DUE TO PPOM D/C.

***** 10/16/2007 14:13:13 KSZCZEPANS *****

RECVD VM FROM 10/15/07 RE FILE. HE WAS R/C. ADV WHAT HE WANTS ME TO DO NEXT AS INS HAS BEEN MOVED. HE ADV TO CONFIRM INS MOVED AND THEN HAVE DARCY CK OUT NEW FACILITY TO SEE IF THEY CAN CARE FOR INS LONG TERM.

RECVD VM FROM DARCY THAT SHE WAS WAITING FOR HER NEXT ASSIGNMT.

I CALLED REGENCY HGTS IN DETROIT TO CONFIRM INS WAS MOVED THERE FRI. SHE IS THERE.

10/16/2007 Balance Claim: Reserve Increased to 1408319.57

***** 10/17/2007 10:27:37 MHATCHER *****

**** RECOVERY ****

SUBRO DIARY: REC'D CK# 445445, FROM DETROIT MACOMB HOSPTIAL IN AMOUNT OF \$ 250.67.

***** 10/17/2007 16:18:01 KSZCZEPANS *****

RECVD LTR FROM ATTY THAT INS WAS ADMITTED TO SINAI YESTERDAY 10/15/07 DUE TO ELEVATED TEMP.

***** 10/17/2007 16:29:50 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM MED CTR EMERG SVX 6/3/07 \$661. REF TO RW.

SENDING EMAIL THAT INS IS IN THE HOSPITAL AGAIN.

10/18/2007 Balance Claim: Reserve Increased to 1408339.73

***** 10/19/2007 17:06:06 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM HHCC DORVIN 7/20/07-7/30/07 \$3609.74. WE HAVE ALREADY PAID THE RESIDENTIAL FOR ENTIRE MOS OF JULY 07. WE HAVEN'T PAID THE EXTRAS. WE RECVD NOTES BUT NO EXPLANATION FOR EXTRA CHARGES.

RECVD REQ NOTES FROM DORVIN FOR SERVICES BUT NO ITEMIZATIONS OR RX.

**SENDING LTR REQ ITEMIZATIONS, RECPTS, RX FOR EXTRA CHARGES FOR ALL BILLS.

***** 10/19/2007 17:22:02 KSZCZEPANS *****

RECVD 2 VM FROM DARCY/OUR CASE MGR AND R/C. SHE CKD OUT NEW FACILITY AND INQ AND THEY ARE CAPABLE OF HANDLING INS NEEDS. SHE ADV IT IS VERY NICE, NEW, CLEAN. IT HAS ONLY BEEN OPEN SINCE JULY. I ADV HER INS IN HOSPITAL. SHE GAVE ME SOME DIRECTION AS

TO CK ON STAT OF INS @ SINAI.

***PHN 15 MINUTES

CALLED SINAI AND REQ NURSING STATION. 313-966-3300. INS IN ROOM 558. I REQ NURSE AND WAS ON HOLD FOR 10 MINUTES. HAD TO CALL BK. I SPK TO LANESE NURSE CASE MGR. SHE WAS VERY NICE AND HELPFUL. INS WAS ADMITTED FOR FEVER AND FOOT ULCER. THEY ARE CKG FOR OSTEOMYELITIS AND SHE IS BEING TX WITH ANTIBIOTICS. THERE

CONSIDERATION OF AMPUTATION. THE HOLD UP IS GUARDIAN. SHE HAS BEEN APPROACHED SEVERAL X RE THIS AND ARE WAITING FOR HER DECISION. LANESE PAGER 313-745-0203, ENTER CODE 94164.***PHN 20 MINUTES

DIARY:

INS IS CURRENTLY AT SINAI DUE TO FOOT ULCER. GUARDIAN, CASE MGR WANT HER IN AN APT. DR RAY HAS NOT RESPONDED TO LTR I SENT HIM RE THIS ISSUE. WE HAVE HIRED DARCY/CASE MGR BK AS CONSULTANT. MARY JOHNSON IS GUARDIAN HIRED CASE MGR. THERE HAS BEEN NO ADDTL CONTACT FROM ATTY RE INS CURRENT HOSPITALIZATION. CLM PENDING.

***** 10/19/2007 17:33:37 KSZCZEPANS *****
I COULDN'T FIND ANY NOTES RE SUBRO. SENDING EMAIL TO KRISTIN TO SEE IF IT IS ON HER DIARY.



***** PIP: MEDICAL BILL REVIEW *****
RECVD CC OF LTP CENT OF THE SERVICE OF THE S RECVD CC OF LTR SENT BY RW TO MED CTR EMERG SERV 6/3/07 PLEASE PROVIDE ER RECORDS.

***** 10/22/2007 13:00:57 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****
SENDING RW 4809056 & 4810296 TO PULMONARY AND CRIT CARE 8/13/07, PROVIDER BILLED FOR PROC NOT SUPPORTED BY MED RECORDS.

***** 10/22/2007 13:39:35 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****
SENDING RW 4817044 TO LEONARD ELLISON JR 5/3/07, PREV REQ TX NOTES NOT RECVD.

***** 10/22/2007 13:44:11 KSZCZEPANS *****

***** PIP: MEDICAL BILL REVIEW *****

SENDING RW 4817955 TO UROSEV REDDY 4/3/07-4/22/07, TX NOT RELATED, PYT DENIED.

SENDING RW 4811576 TO PULMONARY & CRIT CARE 8/20/07-8/21/07 PLEASE SUBMIT WITH TX NOTES.

***** 10/22/2007 13:49:05 KSZCZEPANS *****

SENDING RW 4809056 TO PULMONARY & CRIT CARE 8/13/07 PROVIDER BILLED FOR PROC NOT SUPPORTED BY MED RECORDS.

***** 10/22/2007 14:29:29 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM CASE MGR MARY JOHNSON 9/4/07-9/27/07 \$1179. INS WAS ADMITTED TO HOSP FROM 8/21/07 TO PRESENT. BARRIER FREE APT @ PRENTISS ON HOLD. LTRS RECVD FROM DR RAY AND DR ELLISON IN SUPPORT OF APT FOR INS. THESE WERE NOT ATTACHED TO REPORT. WILL DISCUSS BILL WITH RON.

***** 10/22/2007 16:21:13 KSZCZEPANS *****

***** LITIGATION MANAGEMENT ****

FOR MOS OF SEPT 07 ACCT# 1-7139M, STATEMT 4116 \$75. PAYING SAME.

10/22/2007 Balance Claim: Expense Reserve Increased to 44787.87

10/23/2007 Balance Claim: Reserve Increased to 1408591.28

***** 10/29/2007 15:27:19 KSZCZEPANS *****

RECVD VM FROM SANDRA BURKES OF SELECT SPECIALITY INQ IF WE ARE GOING TO PAY FOR INS ADMITTANCE. R/C AND ADV THAT IF TX RELATED TO MVA, WE CONSIDER AT R/C. IF RELATED TO DIABETES, NOT COVERED. SHE ADV THEY ARE A MEDICARE NOT MEDICAID FACILITY. ADV SHE

IS TX FOR OSTEOMYELITIS. UNK IF RELATED TO MVA OR HER DIABETES. SHE WILL HAVE TO DO SOME FURTHER CKG.

RECVD EMAIL FROM DARCY/CASE MGR FOR STAT.

SENT EMAIL ADV THAT INS AT SINAI FOR OSTEOMYELITIS. FAMILY WANTS TO MOVE HER TO SELECT SPECIALITY AND THEN TO APT NEXT WK. ADV SHE IS ON LONG TERM IV ANTIBIOTICS. ADV HER WANTS HER TO FIND FACILITY THAT CAN MEET HER NEEDS AS WE ARE GOING TO

THE APT

***** 10/29/2007 15:33:43 KSZCZEPANS ***** ON 10/26/07 RECVD CALL FROM SHIRLEY MICHAELS OF SINAI ADV THAT FAMILY WANTS INS MOVED THERE AND WILL BE MOVING INS TO APT 11/7/078. GUARDIAN REFUSING FOR INS TO GO BK TO REGENCY HGTS. AT THAT TIME I HAD ASKED FOR SOMETHING IN WRITING.****PHN 15 **MINUTES**

HE ADV ME TO HAVE DARCY FIND A SUITABLE FACILITY THAT CAN MEET INS NEEDS. INS IS ON IV ANTIBIOTICS FOR OSTEOMYELITIS. ***PHN 10 MINUTES

CALLED SHIRLEY THIS AM BUT SHE WAS NA. I THEN CALLED JENNIFER 313-966=3732 AND LMOM ADV IT IS UP TO FAMILY IF INS IS MOVED TO SELECT SPECIALITY. I ALSO CALLED AND SPK TO SOCIAL WORK AND WAS ADV THAT JUDY WAS SOCIAL WORKER ON DUTY TODAY 313-966-3896. I LMOM, SAME AS JENNIFER.

***** 11/01/2007 18:10:40 KSZCZEPANS *****
ON 10/30/07 RECVD CALL FROM VANESSA OF MIKE MORSE OFFICE REQ A LTR BE FAXED TO THEM
ADV WE WILL PAY FOR INS TO BE IN SELECT SPECIALITY. ADV CHIKETA PALMORE IS REP
THEM. SHE ADV THEY ARE ALSO REP. ADV I NEED LTR OF REP. ADV WE ARE NOT COVERING
CARE
FOR DIABETES.

I CALLET TO DISCUSS. LMGM TO RC.

RECAD CALL FROM AND HE ASKED ME TO COME DOWN. WE DISCUSSED ISSUE.
HEATHER ATNIP FROM MIKE MORSE OFFICE HAD CALLED HIM TO INO WHAT IS GOING ON. HE
EXPLIND THE APT SITUATION AND THAT WE ARE NOT GOING TO COVER THAT. I ADV BON THAT
SELECT SPEC IS A MEDICARE ONLY PLACE. IF TX IS RELATED TO DIABETES SHE CAN'T GO
THERE! IT
IS NOT CLEAR IF THE OSTEOMYELITIS IS RELATED TO MVA OR DIABETES. RON DICTATED A LTR
TO MS ATNIP RE OUR POSITION RE SELECT SPECIALTY HOSP.

***MTG 30 MINUTES

RECYD CC OF LTR SENT BY RON TO MICHAEL MORSE OFFICE. WE ARE NO LONGER TO DEAL WITH MS PALMORE.

***** 11/06/2007 09:59:24 KSZCZEPANS *****
RECVD VM FROM DARCY/OUR CASE MGR. SHE DID NOT RECV MY EMAIL. R/C AND LMOM TO R/C.

RECVD VM ANDREW MOSS OF PROGRESSIVE MED. HE NEEDS APPROVAL FOR MATTRESS AND FRAME, R/C AND LMOM REQ WHO IS REQ THIS AND ALSO DENIED APPROVAL FOR SAME.

***** 11/06/2007 10:22:21 KSZCZEPANS *****
RECVD CALL BK FROM ANDREW OF PROGRESSIVE MED. HE ADV THAT MARY JOHNSON/CASE MGR REQ
THE BED. ADV THAT SHE HAS NO AUTHORITY WHATSOEVER ON THIS FILE. HE WILL MAKE NOTE.

***** 11/06/2007 13:42:14 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM MED CTR EMERG SVCS 6/3/07 \$661. REF TO RW.

***** 11/08/2007 09:31:03 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES ****

RECVD 4 BILLS FROM CHANDER KANTA MD 3/1/07-3/6/07 \$600, 3/7/07-3/12/07 \$600, 3/13/07-3/16/07 \$400, 3/17/07-3/22/07 \$700. REF TO RW.

11/08/2007 Balance Claim: Reserve Increased to 1408852.69

***** 11/09/2007 10:33:42 KSZCZEPANS *****
REGVD VM FROM KARIM OF REGENCY HGTS/NURSING HOME INS WAS AT.

RECVD CALL FROM KARIM OF REGENCY HGTS REQ BILLING INFO. SUPPLIED SAME. THEIR DAILY RATE FOR R/B IS \$175 DAILY.

***** 11/09/2007 16:43:38 KSZCZEPANS *****
***** PIP: EVAL OF DAMAGES/INJURIES *****

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Printed: 02/12/2008

15:37:12

Claim..... 21-A00881-Claim Date. 01/10/2005

Insured.... LAWSON, SADIE Claimant... LAWSON, SADIE

Your previous notes were saved in a text file: 21A00881. To see this file press F12 / To exit this file press Alt_F+X

***** 11/13/2007 11:07:47 KSZCZEPANS *****

**** PIP: EVAL OF DAMAGES/INJURIES ****

RECVD BILL FROM LEONARD ELLISON JR 10/15/07 \$110. REF TO RW.

***** 11/13/2007 12:27:22 KSZCZEPANS *****

**** PIP: EVAL OF DAMAGES/INJURIES ****

RECVD BILL FROM NORTHLAND MEDICAL BLDG PHARMACY 11/6/07-11/8/07 \$1490.23. REF TO RW.

11/13/2007 Balance Claim: Expense Reserve Increased to 60092.91

***** 11/19/2007 12:25:17 KSZCZEPANS *****

**** PIP: EVAL OF DAMAGES/INJURIES ****

RECVD 2 BILLS FROM REGENCY HGTS DETROIT 10/12/07-10/15/07 \$525, 10/31/07 \$175. REF TO RW.

***** 11/19/2007 16:55:34 KSZCZEPANS *****

**** LITIGATION MANAGEMENT ****

RECVO BILL FROM FOR MOS OF OCT 07 ACCT# 1-7139M, SMATEMT 4312 PAYING SAME.

11/20/2007 Balance Claim: Expense Reserve Increased to 60684.91

**** 11/21/2007 11:40:16 KSZCZEPANS *****
RECVD AND SENT 5 EMAIL TO DARCY OUR CASE MGR.

WE HAVE MTG WITH ON 11/26/07 @ 1PM TO DISCUSS THEIR REQ DUTIES ON BELL FOR US.

11/21/2007 Balance Claim: Reserve Increased to 1411659.64

***** 11/27/2007 13:11:14 KSZCZEPANS *****

***** PIP: EVAL OF DAMAGES/INJURIES *****

RECVD BILL FROM WM BEAUMONT HOSP 6/15/07 \$77.16. REF TO RW.

11/29/2007 Balance Claim: Reserve Increased to 1412543.20

***** 12/03/2007 13:07:59 KSZCZEPANS ****

PREPARED MED RELEASE AND FAXED TO MICHAEL MORSE FOR REBIE TO SIGN.

ON 11/26/07 MET WITH DESCRIPTION DARCY HOYES AND A MGR FROM BROWN REHAB REDERCY'S DUTIES ON THIS FILE WE DECIDED I WOULD PREPARE A RELEASE FOR REBIE, GUARDIAN TO SIGN AND DARCY WILL USE THAT. SHE IS ALSO PREPARING LISTSOF FACILITIES THAT CAN TAKE INS.***45 MIN MTG

***** 12/04/2007 14:50:02 KSZCZEPANS *****

RECVD VM FROM THELMA OF SINAI RE \$26,074 7/13/07-7/20/07. R/C. AS OF 10/25/07
IN RW IT IS STILL PENDING FOR RECORDS. SHE ADV SHE SENT TO THEM ON 11/14/07 SO
IT COULD STILL BE IN REVIEW. SHE TOOK GREG/RW INFO.

File Status Sheet

rinted: 07/16/2008 11:58:13

> Claim..... 21-A00881-Claim Date. 01/10/2005 Insured.... LAWSON, SADIE Claimant... LAWSON, SADIE

***** 04/17/2008 07:21:17 CDAVIS *****

\FTER NUMEROUS DISCUSSIONS WITH SPECIALIZED HOME CARE/ADVENT ADJ INFORMED
PROVIDER AGAIN THAT RECORDS WERE NOT REC'D WITH BILLING AND NEEDS TO BE
RESUBMITTED

REC'D PKG FROM ADVENT. THERE IS COPY OF EOB AND 1500'S STILL NO RECORDS. FORWARDED TO MM TO REVIEW/

:******** T/C ******** .

***** 04/18/2008 08:38:37 CDAVIS *****

REC'D BILL FROM HEALTH CALL OF DETROIT. DOS 02/1/08 TO 02/29/08 TOTAL 41606.00

RENDING LETTER ADVISING THEM PAYMENT IS BEING MADE DIRECTLY TO ATTY AND GUARDIAN AND THEY CAN SEND BILLING TO THEM FOR REIMBURSEMENT

*********** LETTER *******

*** 04/25/2008 15:26:27 CDAVIS *** **

M FROM CARLA AT SPECIAL ADVENT

RICHARD THE TO SECTION OF THE PROTECTION OF THE PROTECTION OF THE PROTECTION OF THE PROTECTION ALL THERE IS IS A SCRIPT NOV I WANT THE INVOICES OF THE SUPPLIES A SCRIPT IS NOT SUFFICIENT DOCUMENTATION

ADV THESE WILL BE REQUIRED BEFORE PAYMENT WILL BE MADE ADV DAWN WITNESSED THE PKG AND THEY CAN FEEL FREE TO SPEAK TO HER CARLA SAID SHE IS NOT SENDING INVOICES EVERY TIME IF SHE SENDS ONE THAT IS ENOUGH I ADV THE COSTS CAN CHANGE AND THAT WILL BE REQUIRED WITH EACH BILLING.

:***********15 MINT

***** 04/30/2008 08:51:19 CDAVIS *****
DIARY:

>IP TRIGGER: CLAIMANT WAS A PEDESTRIAN STRUCK BY AN UNINSURED VEHICLE

LAIMANT STATUS: CLAIMANT SUFFERED A SEVERE HEAD INJURY. SHE WAS INPATIENT TO FACILITIES FROM THE DOL UNTIL NOVEMBER 2007, AT WHICH TIME HER SISTER/GUARDIAN MOVED HER OUT OF FACILITIES AND TOOK HER TO AN APARTMENT WITH COUND THE CLOCK ATTENDANTS INCLUDING RNS, LPNS AND HH AIDES. THIS IS NOT COST IFFECTIVE NOR DOES THIS FALL WITHIN THE GUIDELINES OF THE NO FAULT STATUTE WHICH IT IS THE ACF TO PAY THE LOWEST AMOUNT FOR THE NECESSARY SERVICE.

ITAN IS PAYING 350 00 PER DAY FOR HOUSING/NURSING AS THIS IS COMPARABLE TO ACILITIES WHICH PROVIDE THIS TREATMENT.

IL ADDITONAL SERVICES ARE BEING PAID AND REVIEWED.

File Status Sheet

rinted: 07/16/2008 11:58:13

> Claim..... 21-A00881-Claim Date. 01/10/2005 Insured.... LAWSON, SADIE Claimant... LAWSON, SADIE

HERE HAVE BEEN SOME ISSUES WITH THE BILLS FROM SPECIALIZED HOME CARE/ADVENT HEY SEND 1500'S AND A SCRIPT WITH NO DOCUMENTATION OF THEIR COSTS. I HAVE NFORMED THEM WE WILL REQUIRE INVOICES FOR THE SUPPLIES TO DETERMINE THE EIMBURSEMENT. THEY ARE UNHAPPY ABOUT THIS BUT WE ARE ENTITLED TO THE LOWEST OST AND DOCUMENTATION OF COSTS IS NOT UNREASONABLE.

UBRO: LEROY REYNOLDS JR.

**** 05/05/2008 08:00:11 CDAVIS *****
EC'D CASE MANAGEMENT REPORT THERE HAVE BEEN NO CHANGES IN THIS CASE
ROPPED TO FILE

**** 05/05/2008 10:15:58 CDAVIS *****

EC'D LETTER FROM CLMT ATTY STATING WE DID NOT PAY INTEREST ON THE GUARDAIN EES. THESE WILL NOT BE PAID AT THIS TIME.

E ALSO SAYS THERE WAS NO AGREEMENT FOR GUARDIAN FEES:

EVIEWED NOTES THE 15 PER WK HAS BEEN THE PD FIGURE SINCE 2005 AND THE DDITIONAL 5 PER WEEK WAS FOR LAUNDRY. THE 20 PER WEEK WILL CONTINUE TO BE AID.

AY 3 FOR APRIL SERVICES HOUSING/NURSING 30 DAYS @ 350.00 PER DAY 0,500.00

AYING GURADIAN FEES FOR APRIL 200.00

********* CHECKS ********

**** 05/12/2008 14:55:31 MREESMAN *****

CVD INV FROM M. JOHNSON & ASSOC, LLC, CASE MGMT DOS 3/31/08 TO 4/30/08 1,410.00

AID SAME

**** 05/15/2008 09:39:44 DNEELY ****

eviewed on diary. Clmt suffered severe TBI as a result of mva. Titan was dvised that the best tx for clmt would be received in a TBI program, which clmt uardian refused to do. Clmt guardian has chosen to remove clmt from facility hich could take care of her and set her up in an apartment with LPN, RNS and HH ides. Titan has advised atty representing clmt guardian that we will cover the xpense of a facility that would be able to attend to the clmt's needs but that will not cover the entire expense of a sub-acute facility set up solely for he are of the clmt. Claim continues to be monitored by adj.

here are pending invoices from Advent that are being addressed. They have not o date provided the invoices for supplies which have been requested based on arper vs Auto club which allows us to know the mark up that the provider is

File Status Sheet

rinted: 07/16/2008 11:58:13

> Claim..... 21-A00881-Claim Date. 01/10/2005 Insured... LAWSON, SADIE Claimant... LAWSON, SADIE

PROVIDED REPROME TO MEAN REPROSE TO THE PROPERTY OF THE PROVIDED REPROSE TO MEAN REPROSE TO MEAN REPROSE TO MEAN REPROSE TO MEAN REPROSE TO THE PROVIDED REPROSE TO THE PROVID

**** 06/09/2008 11:34:56 CDAVIS *****
PIP TRIGGER: CLAIMANT WAS A PEDESTRIAN STRUCK BY AN UNINSURED VEHICLE

"LAIMANT STATUS: CLAIMANT SUFFERED A SEVERE HEAD INJURY. SHE WAS "NPATIENT AT FACILITIES FROM THE DOL UNTIL NOVEMBER 2007, AT WHICH TIME IER SISTER/GUARDIAN MOVED HER OUT OF FACILITIES AND TOOK HER TO AN "PARTMENT WITH ROUND THE CLOCK ATTENDANTS INCLUDING RNS, LPNS AND HH "IDES. THIS IS NOT COST EFFECTIVE NOR DOES THIS FALL WITHIN THE UTDELINES OF THE NO FAULT STATUTE WHICH ALLOWS THE ACT TO PAY THE OWEST AMOUNT FOR THE NECESSARY SERVICE."

"ITAN IS PAYING 350.00 PER DAY FOR HOUSING/NURSING AS THIS IS "OMPARABLE TO FACILTIES WHICH PROVIDE THIS TREATMENT.

"LL ADDITONAL SERVICES ARE BEING REVIEWED AND PAID REVIEWED."

HERE HAVE BEEN SOME ISSUES WITH THE BILLS FROM SPECIALIZED HOME ARE/ADVENT THEY SEND 1500'S AND A SCRIPT WITH NO DOCUMENTATION OF HET COSTS. I HAVE INFORMED THEM WE WILL REQUIRE INVOICES FOR THE UI IES TO DETERMINE THE REIMBURSEMENT. THEY ARE UNHAPPY ABOUT THIS UT WE ARE ENTITLED TO THE LOWEST COST AND DOCUMENTATION OF COSTS IS OT UNREASONABLE.

ANAGER IS ALSO ATTEMPTING TO DEAL WITH THIS ISSUE. COPIES OF THE INVOICES AS UBMITTED HAVE BEEN FORWARDED TO BOTH WRIGHT & FILIPPIS AND PROGRESSIVE MEDICAL OR COST COMPARISONS.

UBRO: LEROY REYNOLDS JR.

**** 06/09/2008 12:50:25 CDAVIS *****
EC'D BILL & REPORT FROM CM REIVEWED REPORT. CM CONTINUES TO MONITOR CLMT
HE AUTHORIZES ADDITIONAL TX AND SERVICES W/O DISCUSSING WITH THIS OFFICE. WILL
ONITOR ALL BILLINGS CLOSELY

**** 06/10/2008 07:43:19 CDAVIS *****

**** 06/10/2008 11:22:51 MREESMAN *****

CVD INV FROM M JOHNSON & ASSOC, LLC, CASE MGMT DOS 4/30/08 TO 5/31/08 1,120.00 AID SAME

INV FROM INNOVATIVE REHAB SYS INV #4725 DOS 5/20/08 TO 5/30/08 4,445.74 AID SAME

CVD INV FROM INNOVATIVE REHAB SYS INV #4559 DOS 1/17/08 798.53 PAID SAME